

1 JAMES E. WHITMIRE, ESQ.
2 Nevada Bar No. 6533
3 jwhitmire@santoronevada.com
4 SANTORO WHITMIRE
5 10100 W. Charleston Blvd., Suite 250
6 Las Vegas, Nevada 89135
7 Telephone: 702/948-8771
8 Facsimile: 702/948-8773

9
10 *Attorney for Defendants Hachiman, LLC dba
11 Palomino Club and Lacy's, PalominoClub, LLC
12 dba Palomino Club, Lacy's LLC, Adam Gentile
13 and Craig Parks*

14
15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 UNITED SPECIALTY INSURANCE
18 COMPANY, a Delaware corporation,

19 Plaintiff,
20 vs.

21 HACHIMAN, LLC dba PALOMINO CLUB and
22 LACY'S, a Nevada limited liability company;
23 PALOMINO CLUB, LLC dba Palomino Club, a
24 Nevada limited liability company; LACY'S LLC
25 dba LACY'S, a Nevada limited liability
company; ADAM GENTILE, an individual;
CRAIG PARKS, an individual; DEREK
FESOLAI, an individual; ALEXANDER
POTASI, an individual; DOE INDIVIDUALS I
through X, inclusive and ROE BUSINESS
ENTITIES I through X, inclusive,

26
27 Defendants.

28 Case No.: 2:16-cv-02784-APG-EJY

29
30 **STIPULATION AND ORDER
31 EXTENDING THE TIME FOR
32 DEFENDANTS TO FILE RESPONSE TO
33 PLAINTIFF'S MOTION FOR FURTHER
34 RELIEF OR, IN THE ALTERNATIVE, TO
35 AMEND THE JUDGMENT**

36
37 **(First Request)**

38 United Specialty Insurance Company ("Plaintiff") and Hachiman, LLC dba Palomino
39 Club and Lacy's, Palomino Club, LLC dba Palomino Club, Lacy's LLC, Adam Gentile, and
40 Craig Parks ("Defendants") state the following:

41 1. Plaintiff United Specialty Insurance Company filed its Motion for Further Relief
42 or, in the Alternative, to Amend the Judgment (ECF No. 79) ("Motion") on January 31, 2020.

1 2. The current deadline for Defendants to file their Response to the Motion is
2 February 14, 2020.

3 3. A ten-day extension is sought to respond to the Motion in good faith and not for
4 purposes of undue delay. An extension is sought given that counsel for Defendants' counsel is
5 departing Las Vegas to attend to an out of state family matter involving his elderly parents in the
6 Midwest, together with ancillary workload matters.

7 4. The parties agree that Defendants will have up to and including **February 24, 2020** to file a Response.

9 **IT IS SO AGREED AND STIPULATED:**

10 CHRISTIAN, KRAVITZ, DICHTER,
11 JOHNSON & SLUGA, LLC

SANTORO WHITMIRE

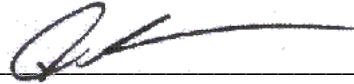
12 /s/ L. Renee Green
13 Martin J. Kravitz, Esq.
14 Nevada State Bar No. 83
15 L. Renee Green, Esq.
16 Nevada State Bar No. 12755
17 8985 S. Eastern Avenue, Suite 200
18 Las Vegas, NV 89123
19 Phone: (702) 362-6666
20 Fax: (702) 992-1000
21 Email: mkravitz@ksjattorneys.com
22 rgreen@ksjattorneys.com

23 *Attorneys for Plaintiff*

12 /s/ James E. Whitmire
13 James E. Whitmire, Esq.
14 Nevada State Bar No. 6533
15 10100 W. Charleston Blvd., Suite 250
16 Las Vegas, NV 89135
17 Phone No.: (702) 948-8771
18 E-mail: jwhitmire@santoronevada.com

19 *Attorney for Defendants Hachiman,
20 LLC dba Palomino Club and Lacy's,
21 PalominoClub, LLC dba Palomino
22 Club, Lacy's LLC, Adam Gentile
23 and Craig Parks*

24 **IT IS SO ORDERED:**

25 
26 _____
27 UNITED STATES DISTRICT JUDGE
28 Dated: February 12, 2020.